

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Anerio V. Altman, Esq. #228445 Lake Forest Bankruptcy II, APC PO Box 515381 Los Angeles, CA 900051 Phone and Fax: (949) 218-2002 avaesq@lakeforestbkoffice.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: DEBTOR</p>		<p>FOR COURT USE ONLY</p>	
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</p>			
<p>In re: JEFF SCOTT BEIER</p>		<p>CASE NO.: 8:23-bk-10898-TA CHAPTER: 7</p>	
<p>Debtor(s).</p>		<p>NOTICE OF OPPOSITION AND REQUEST FOR A HEARING</p>	

1. TO (specify name): CHAPTER 7 TRUSTEE ARTURO CISNEROS
2. NOTICE IS HEREBY GIVEN that DEBTOR JEFF SCOTT BEIER,
a party in interest, hereby opposes the following request (specify that which is opposed):
MOTION TO EMPLOY BRIAN THOMPSON AS DOCKET #66
3. This opposition is based upon the following grounds (specify grounds):
Mr. Thompson has not exercised his best efforts to market the property and the estate is being deprived of the value of a significant asset by his lack of efforts.

4. Attached hereto are the following documents in support of this opposition which are admissible under the Federal Rules of Evidence (*specify declarations and exhibits by name or description*):
See attached Memorandum, Declaration of Jeff Beier and Jeff Moran and accompanying Exhibits.

5. ☒ (Optional) Attached hereto is a Memorandum of Points and Authorities upon which opposing party will rely.

6. Total number of attached pages of supporting documentation: 34

Any reply to this opposition must be filed with the court and served on this opposing party not later than 7 days prior to the hearing on the motion.

WHEREFORE, the undersigned prays that this court deny the subject request and set this matter for a hearing.

Date: 8/9/2023

Respectfully submitted,

LAKE FOREST BANKRUPTCY
Printed name of law firm


Signature

ANERIO V. ALTMAN, ESQ.
Printed name

Attorney for: DEBTOR

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

PO Box 515381, Los Angeles, Ca 90051

A true and correct copy of the foregoing document entitled: **Notice of Opposition and Request for a Hearing** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 08/09/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 08/09/2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Delivery to the court per the court manual.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

08/09/2023
Date

ANERIO V. ALTMAN, ESQ.
Printed Name


Signature

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

CM/ECF SERVICE

- **Anerio V Altman** LakeForestBankruptcy@jubileebk.net,
lakeforestpacer@gmail.com
- **Greg P Campbell** ch11ecf@aldridgepite.com,
gc@ecf.inforuptcy.com;gcampbell@aldridgepite.com
- **Arturo Cisneros** arturo@mclaw.org, CACD_ECF@mclaw.org
- **Arturo Cisneros (TR)** amctrustee@mclaw.org,
acisneros@iq7technology.com;ecf.alert+Cisneros@titlexi.com
- **Michael J Hauser** michael.hauser@usdoj.gov
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov

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ATTORNEY FOR
DEBTOR JEFFREY SCOTT BEIER

UNITED STATES BANKRUPTCY COURTS
CENTRAL DISTRICT OF CALIFORNIA-SANTA ANA DIVISION

In Re: JEFFREY SCOTT BEIER

BK. No. 8:23-bk-10898-TA

Chapter 7

**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF THE
OPPOSITION TO THE MOTION TO
EMPLOY BRIAN THOMPSON FILED AS
DOCKET #66**

JUDGE

Hon. Theodor Albert

**HEARING TO BE SET PURSUANT TO
LOCAL RULE OF BANKRUPTCY
PROCEDURE 9013-1(o)**

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DEBTOR JEFFREY SCOTT BEIER files this Opposition (“Opposition”) to the Motion to Employ Brian Thompson of Winterstone Real Estate Development filed as Docket #66 in this matter as follows:

I. INTRODUCTION

The employment of Mr. Thompson is not in the best interests of the estate.

Mr. Thompson has done a poor job in marketing the property in a manner that has artificially deflated its sale value. Mr. Thompson has taken no steps to spruce up, or improve, the property and has employed the barest efforts to find a buyer. Based upon expert testimony provided with this Opposition, the Debtor believes the property could be sold for closer to \$3,400,000 rather than the \$3,000,000 that Mr. Thompson is proposing for the listing. It is in the best interests of the estate if a different broker, as suggested by the Debtor in this Opposition, is employed on behalf of the estate.

II. THE DISPOSITION OF THE ESTATE

The estate is not particularly complex.

The tangible¹ assets of the estate consist of the residence located at 10 Tucson, Coto De Caza, Ca 92679 (“Property”). The creditors originally scheduled consisted of 1 secured creditor with an interest in the Property in the amount of approximately \$2,786,180.50² and three unsecured creditors. Of the unsecured creditors, the largest claim belongs to the Debtor’s parents who claim approximately \$500,000. Exhibit A. The next largest belongs to the Debtor’s brother for \$150,000. Id. The last unsecured creditor is a former renter of the Property who has a claim for approximately \$9,500³. Id. This case was originally a Chapter 11 matter in which a Chapter 11

¹ The estate’s intangible assets consist of some litigation claims which no party has sufficiently assessed at this time and some tax refunds which may or may not be set off by the taxes that are also claimed as owed by the IRS.

² POC Claim #2 filed on July 12th, 2023.

³ Id.

Trustee was appointed so there is also an anticipated administrative claim to be filed, both by the Chapter 11 Trustee, Arturo Cisneros and Mr. Beier's prior counsel. Neither administrative claim is expected to be significant.

III. THE PROPOSED TERMS OF THE SALE

Mr. Thompson proposes to sell the Property for \$3,000,000 for commission fee of 5% split between seller's and buyer's agent or \$150,000. That leaves \$2,850,000 of which the Bank of New York Mellon claims \$2,786,180.50 leaving \$63,819.50 for the estate. After administrative costs and priority debts are deducted, there is no return with the current numbers on hand to the unsecured creditors⁴.

IV. PROBLEMS WITH MR. THOMPSON'S MARKETING OF THE PROPERTY

Mr. Thompson has not taken the appropriate steps to market a property of this value.

A. REPAIRS IN THE HOUSE

There are numerous repairs that need to be made to the Property to maximize its value that are standard for the sale of a property in this community and at this price such as:

1. The pool and Jacuzzi are green and have been neglected for weeks. Exhibit C, Moran Declaration at Para 6.
2. The interior of the house shows sign of disregard. Id at Para 7.
3. There are non-matching light bulbs and malfunctioning window shades for primary "view" windows and doors;Id.
4. There are chirping fire alarms; Id.and

⁴ The Debtor recognizes, without disclosing details, that the Trustee has been hard at work trying to strike a deal among all the parties to increase the return to the estate.

5. mold in the freezer. Id.

These are easy repairs for Mr. Thompson to have completed prior to marketing the property. None were made.

B. THE PICTURES BEING UTILIZED ON THE MULTIPLE LISTING SERVICE
ARE POOR QUALITY

The property should have a strong presence on the MLS to increase its value. It does not.

The photos that were taken were likely taken by the realtor himself on his iphone. Id. at Para 9. There are only 28 pictures showing online and for a home of this size to truly showcase its beauty and surroundings the minimum photos we suggest would be 55. Id. True and correct copies six of the pictures listed on the MLS demonstrating their equality are attached as Exhibit B. Copies of the pictures that should be online are attached to the Declaration of Jeff Moran, Exhibit C, supra.

C. THE SALES PRICE IS LOW COMPARED TO PROPERTIES IN THE AREA

The Property's current valuation is significantly off target. The Property consists of 5,854 square feet on a 15,000 square foot lot, with no neighbors on one side and no neighbors behind. Id. at Para 10. When the builder sold these homes, this lot had a \$300,000 lot premium. Id. Over the past 90 days, similar-sized homes have sold at \$590/square foot, placing this home closer to \$3,400,000. Id. Additional comparisons, such as 2 Wandering River, 1 Sky Meadow, and 12 Vela Court, further support a sales price closer to \$3,400,000. Id.

D. MR. THOMPSON DOES NOT SPECIALIZE IN ORANGE COUNTY PROPERTIES

Mr. Thompson is an accomplished individual, but his focus is not based upon Orange County, or Southern Orange County properties. His experience as a realtor began in 2010 and he has been involved in numerous bankruptcy sales and receivership transactions both here and

1 throughout the United States. Motion, Exhibit 2. This is something to be proud of, but it does not
2 indicate that he has the sufficient experience to sell this property in this part of the United States.
3 Someone who focuses on properties within Orange County should be selling a property of this
4 value. See Exhibit C, Moran Declaration, supra.

5 E. MR. THOMPSON'S COMMISSION IS PARTICULARLY HIGH

6 Mr. Thompson's commission is on the high side for not making any repairs to the Property,
7 nor taking any professional pictures.

8 Mr. Thompson's commission is 5% to be split with the buyer's agent. Motion, Exhibit 1.
9 The Debtor's suggested realtor, Jeff Moran, would take 2% with 2% to go to the buyer's agent.
10 Moran Declaration, supra .

11 This is a substantial savings to the estate if a different realtor is used.

12 F. MR. THOMPSON HAS ALREADY COST THE ESTATE \$1,200 IN ELECTRICITY
13 COSTS

14 Since Mr. Thompson has been marketing the property over the past month, the air
15 conditioning has been left on resulting in an electric bill of \$1,200 which is an increase from \$300
16 before the marketing. Declaration of Jeff Beier. This is an irresponsible way to manage an estate
17 asset.

18 V. THE POSSIBLE RISK TO THE CREDITORS DOES NOT JUSTIFY
19 EMPLOYING MR. THOMPSON

20 The possible risk to the creditors from the poor marketing of the Property and lack of
21 interest by Mr. Thompson, could cost the creditors possibly \$350,000 and the difference between
22 a middling return and a substantial return. Moran Declaration at Para 12.


1 If the Property were sold for \$3,400,000, the real estate commission earned would be
2 \$136,000 leaving a net of \$3,264,000. Of that, Bank of New York Mellon would be paid its claim
3 leaving \$459,819.50 for the estate. Presuming administrative costs of \$60,000, rounding up, that
4 would leave approximately \$400,000 to the estate to address \$660,000 in claims or a liquidation
5 dividend of 60%. Currently with the numbers as they are in the estate, the possible return to the
6 Creditors is less than 5%, if even that.

7 The possible benefit to the estate justifies employing a different broker.

8 **VI. PRAYER**

9 Based upon the following, Debtor requests that the employment of Brian Thompson not be
10 approved.

11 Dated: 8/9/2023

Signed: 

ANERIO V. ALTMAN, ESQ.
ATTORNEY FOR DEBTOR
JEFF BEIER

DECLARATION OF JEFF BEIER

I, JEFF BEIER, declare as follows:

1. I am over the age of 18 and I am legally able and competent to testify to the following in a court of law if required to do so.
2. I have received the bill from SDGE regarding the Property for the month of July.
3. That bill is \$1,200 in July, the month in which Brian Thompson has been showing the property.
4. That bill previously was around \$300.
5. I am familiar with real estate transactions and sales and understand how marketing a house works.
6. I have been involved in numerous real estate transactions.
7. I believe that Brian Thompson is not putting in any effort to market this Property in exchange for receiving 2.5% of the commission.
8. I make these declarations under penalty of perjury of the laws of the United States.

Dated: August 9th, 2023

Signed: _____

JEFF BEIER

EXHIBIT A

Fill in this information to identify your case:

Debtor 1	<u>Jeffrey</u>	<u>S</u>	<u>Beier</u>
	First Name	Middle Name	Last Name
Debtor 2 (Spouse, if filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	<u>Central District of California</u>		
Case number (if known)			

☐ Check if this is an amended filing

Official Form 106E/F

Schedule E/F: Creditors Who Have Unsecured Claims

12/15

Be as complete and accurate as possible. Use Part 1 for creditors with PRIORITY claims and Part 2 for creditors with NONPRIORITY claims. List the other party to any executory contracts or unexpired leases that could result in a claim. Also list executory contracts on *Schedule A/B: Property* (Official Form 106A/B) and on *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 106G). Do not include any creditors with partially secured claims that are listed in *Schedule D: Creditors Who Hold Claims Secured by Property*. If more space is needed, copy the Part you need, fill it out, number the entries in the boxes on the left. Attach the Continuation Page to this page. On the top of any additional pages, write your name and case number (if known).

Part 1: List All of Your PRIORITY Unsecured Claims

1. Do any creditors have priority unsecured claims against you?

☒ No. Go to Part 2.

☐ Yes.

2. **List all of your priority unsecured claims.** If a creditor has more than one priority unsecured claim, list the creditor separately for each claim. For each claim listed, identify what type of claim it is. If a claim has both priority and nonpriority amounts, list that claim here and show both priority and nonpriority amounts. As much as possible, list the claims in alphabetical order according to the creditor's name. If you have more than two priority unsecured claims, fill out the Continuation Page of Part 1. If more than one creditor holds a particular claim, list the other creditors in Part 3.
(For an explanation of each type of claim, see the instructions for this form in the instruction booklet.)

Total claim	Priority amount	Nonpriority amount
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☐

Priority Creditor's Name _____

Last 4 digits of account number _____

When was the debt incurred? _____

Number _____ Street _____

As of the date you file, the claim is: Check all that apply.

☐ Contingent

☐ Unliquidated

☐ Disputed

City _____ State _____ ZIP Code _____

Who incurred the debt? Check one.

☐ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim is for a community debt

Is the claim subject to offset?

☐ No

☐ Yes

Type of PRIORITY unsecured claim:

☐ Domestic support obligations

☐ Taxes and certain other debts you owe the government

☐ Claims for death or person injury while you were intoxicated

☐ Other. Specify _____

Debtor 1

Jeffrey

S

Beier

Page 33 of 65

Case number (if known)

First Name

Middle Name

Last Name

Part 2: List All of Your NONPRIORITY Unsecured Claims**3. Do any creditors have nonpriority unsecured claims against you?**

- ☐ No. You have nothing to report in this part. Submit this form to the court with your other schedules.
- ☒ Yes.

4. List all of your nonpriority unsecured claims in the alphabetical order of the creditor who holds each claim. If a creditor has more than one nonpriority unsecured claim, list the creditor separately for each claim. For each claim listed, identify what type of claim it is. Do not list claims already included in Part 1. If more than one creditor holds a particular claim, list the other creditors in Part 3. If you have more than three nonpriority unsecured claims fill out the Continuation Page of Part 2.

4.1

Gary and Patricia Beier

Nonpriority Creditor's Name

Drakes Bay

Number Street

Laguna Niguel, CA 92677

City State ZIP Code

Who incurred the debt? Check one.

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another
- ☐ Check if this claim is for a community debt

Is the claim subject to offset?

- ☐ No
- ☒ Yes

Last 4 digits of account number _____

When was the debt incurred? _____

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
- ☒ Unliquidated
- ☐ Disputed

Type of NONPRIORITY unsecured claim:

- ☐ Student loans
- ☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims
- ☐ Debts to pension or profit-sharing plans, and other similar debts
- ☐ Other. Specify _____

Total claim\$500,000.00

4.2

Sandy Elsberg

Nonpriority Creditor's Name

10 Tucson

Number Street

Trabuco Canyon, CA 92679

City State ZIP Code

Who incurred the debt? Check one.

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another
- ☐ Check if this claim is for a community debt

Is the claim subject to offset?

- ☐ No
- ☒ Yes

Remarks: Security Deposit-May be held with property management.

Last 4 digits of account number _____

When was the debt incurred? _____

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
- ☐ Unliquidated
- ☐ Disputed

Type of NONPRIORITY unsecured claim:

- ☐ Student loans
- ☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims
- ☐ Debts to pension or profit-sharing plans, and other similar debts
- ☐ Other. Specify _____

\$10,000.00

Debtor 1

Jeffrey

S

Deleem

Page 34 of 65

Case number (if known)

First Name

Middle Name

Last Name

Part 2: Your NONPRIORITY Unsecured Claims - Continuation Page

After listing any entries on this page, number them beginning with 4.5, followed by 4.6, and so forth.

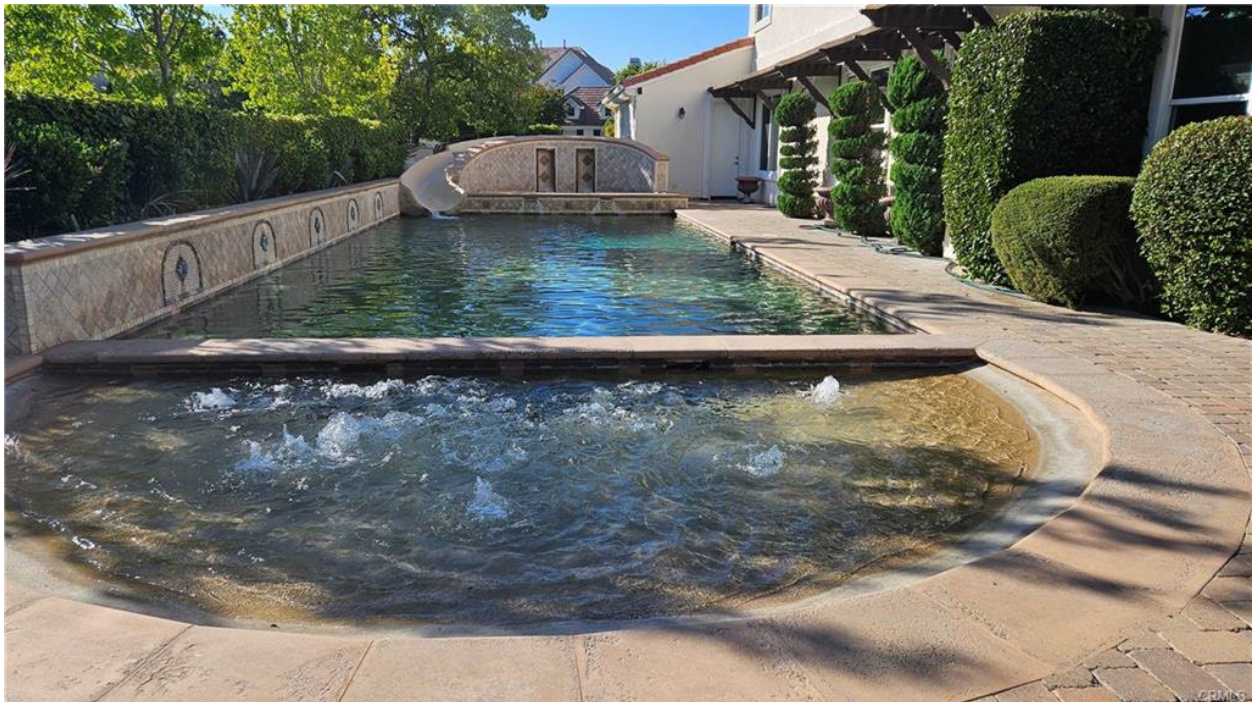
Total claim

4.3	Steven Beier Nonpriority Creditor's Name Number _____ Street _____ San Jose, City _____ State _____ ZIP Code _____ Who incurred the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Last 4 digits of account number _____ When was the debt incurred? _____ As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input checked="" type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input type="checkbox"/> Other. Specify _____	\$150,000.00
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EXHIBIT B

These are the MLS pictures from the current listing (there are only 28 photos total which is also way too few photos for a property this size)

Pool pictures not showing the entire pool, with shadows and bad angles and lighting
Notice the garden hose that should be put away prior to the photo





Interior photos with poor lighting and angles





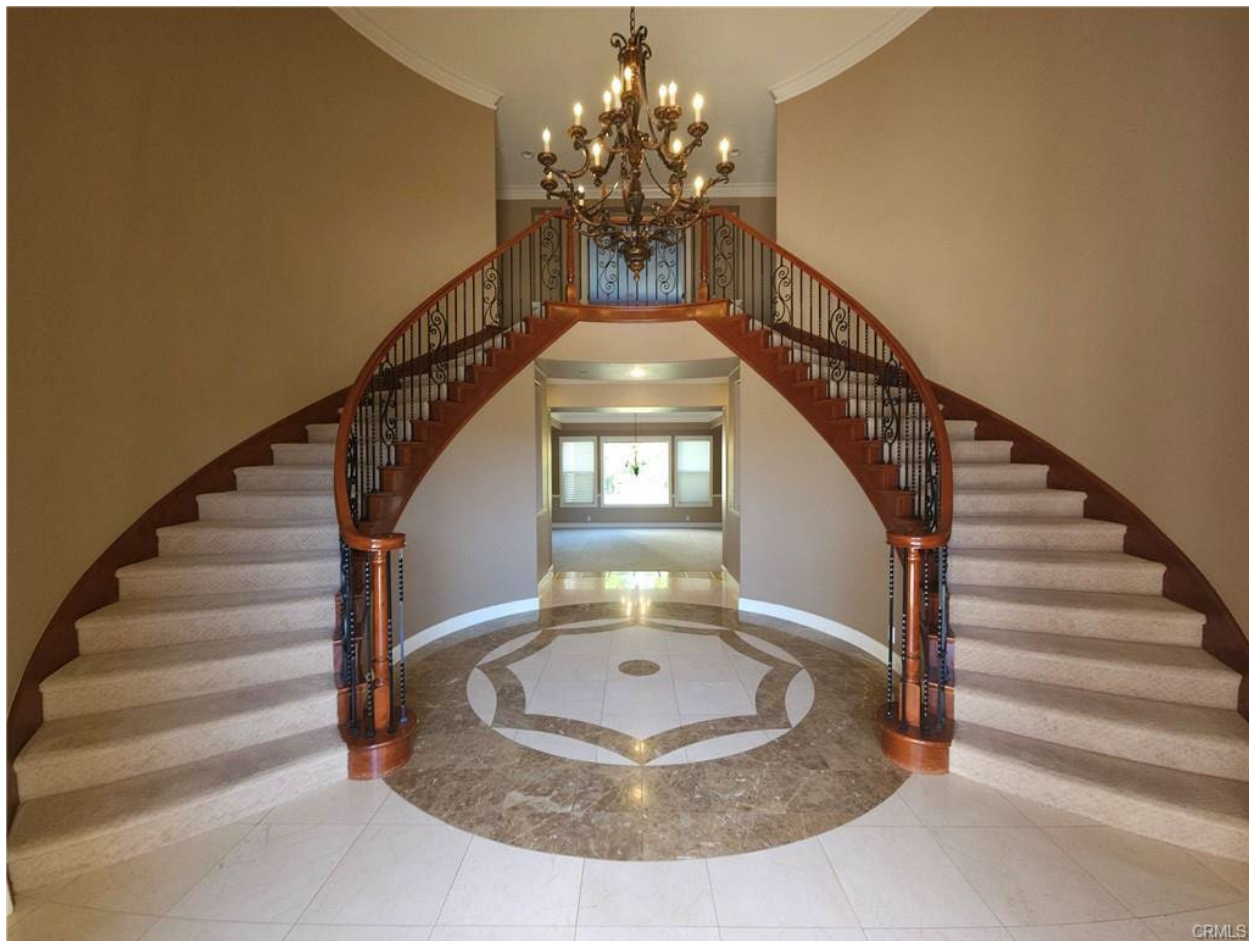












EXHIBIT C

1 Anero V. Altman, Esq. #228445
Lake Forest Bankruptcy
PO Box 515381
2 Los Angeles, CA 90051
Phone and Fax: (949) 218-2002
3 avaesq@lakeforestbkoffice.com
ATTORNEY FOR DEBTOR
4 **JEFFREY SCOTT BEIER**

5
6
7
8 **UNITED STATES BANKRUPTCY COURTS**
CENTRAL DISTRICT OF CALIFORNIA-SANTA ANA DIVISION
9

10 In Re: JEFFREY SCOTT BEIER

) BK. No. 8:23-bk-10898-TA

) **Chapter 7**

) **DECLARATION OF JEFF MORAN**

) **JUDGE**

) Hon. Theodor Albert

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1 I, Jeff Moran, declare as follows:

- 2 1. I am over the age of 18 years old and we are legally able and competent to testify to the
3 following in a court of law if required to do so.
- 4 2. I am a licensed real estate professional. I am a broker assigned Department of Real Estate
5 License Number 01220171. I have been working in real estate since 1997. I work at OC
6 Roots Real Estate and Regency Real Estate Brokers. I have attached a copy of our
7 brokerage information to this declaration as Exhibit A.
- 8 3. We have sold more than 250 homes in the last 10 years in Orange County.
- 9 4. We have reviewed the property located at 10 Tucson in Coto De Caza and we do not believe
10 it is being properly marketed.
- 11 5. A realtor trying to sell a house of this value should be providing more care to the property.
- 12 6. The pool is green and appears to be neglected for weeks.
- 13 7. The interior of the house shows signs of disregard. From trivial, yet pertinent, details such
14 as non-matching light bulbs and malfunctioning window shades for primary "view"
15 windows and doors to more pressing issues like chirping fire alarms and mold in the
16 freezer, it was clear that the necessary steps to optimally present the home for sale have
17 been overlooked.
- 18 8. The state of the property is in start contract to the meticulous care and dedication we bring
19 to every property we represent, ensuring they are shown in the best condition possible to
20 attract the highest possible offers.
- 21 9. Furthermore, the property's online representation on the MLS is extremely low quality.
22 The photos were most likely taken by the current realtor himself on his iphone. Only 28
23 photos are showing online and for a home this size to truly showcase its beauty and
24

1 surroundings the minimum photos we suggest would be 55. Currently the home is priced
2 and is being shown as a distressed property which will not get the price that this home
3 deserves. This lack of attention to detail not only undersells the property's value but also
4 discourages potential buyers from considering it as a viable option.

5 10. In looking at comparable sales in the immediate area, we find compelling evidence that the
6 property's current valuation is significantly off target. The subject property is 5,854 square
7 feet on a 15,000 square foot lot, with no neighbors on one side and no neighbors behind.
8 When the builder sold these homes, this lot had a \$300,000 lot premium. Over the past 90
9 days, similar-sized homes have sold at \$590/square foot, placing this home closer to
10 \$3,400,000. Additional comparisons, such as 2 Wandering River, 1 Sky Meadow, and 12
11 Vela Court, further support a sales price closer to \$3.4M.

12 11. In contrast, the marketing techniques my wife and I employ are designed to enhance and
13 showcase a home's true potential. We ensure that every visual asset is impeccably
14 produced by our professional photographer and videographer, from bright, colorful lighting
15 and thoughtful angles to drone photography, virtual staging and digital marketing which
16 only 1% of Realtors really know how to effectively accomplish.

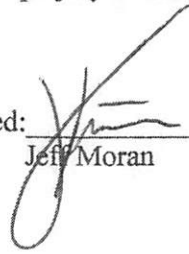
17 12. Upon evaluating recent sales in the area, we strongly believe that the highest offer received
18 to date, \$3,070,000, undervalues the property by approximately \$350,000. We are
19 confident that our dedicated service, combined with our effective marketing strategies, can
20 rectify this situation and attract offers that reflect the property's true worth.

21 13. If selected as realtor, I have agreed to accept 2% commission and to sell this house within
22 60 days.

1 14. I have attached as Exhibit B a true and correct copies of pictures our professional
2 photographer took of the property that I would present online. These are more appropriate
3 pictures that should have been presented instead of what the current agent listed.

4 15. I make these declarations under penalty of perjury of the laws of the United States and
5 know that they are true.

6 Dated: AUG. 9, 2023

Signed: 

Jeff Moran

EXHIBIT A-TO DECLARATION OF JEFF MORAN


HOME

LISTINGS

SELLING ABOUT OUR CURRENT LISTINGS

REGISTER

SIGN IN




Orange County's
Favorite Husband
& Wife Team!

Broker/Owners, Realtors
OCroots.com

SEARCH FOR HOMES

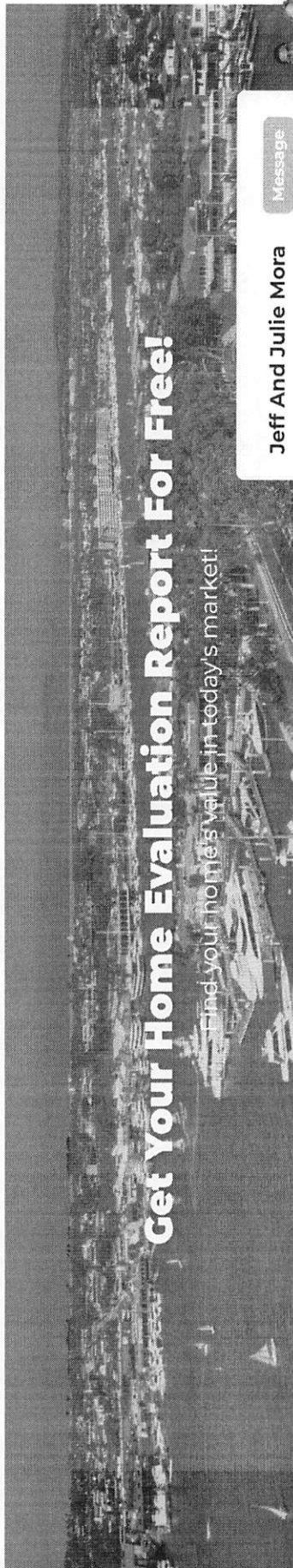
GET YOUR HOME'S VALUE



Jeff Moran
949.289.5170
Jeff@ocroots.com
Lic# 01220171

Julie Moran
949.466.4409
Julie@ocroots.com
Lic# 01714858

Orange County Locals



Get Your Home Evaluation Report For Free!

Find your home's value in today's market!

Jeff And Julie Mora
Please let us know how we can help you.

Message

This site uses cookies to enhance your browsing experience and deliver our information and services. By using this site, you agree to our use of cookies.



JEFF AND JULIE MORAN - ORANGE COUNTY LOCALS



This site uses cookies to enhance your browsing experience and deliver our information and services. By using this site, you agree to our use of cookies.

Jeff And Julie Mora

Please let us know how we can help you.

Message



HOME

LISTINGS

SELLING

ABOUT

OUR CURRENT LISTINGS

REGISTER

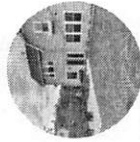
SIGN IN

My husband and I were fortunate to find Jeff and Julie when we first moved to Orange County and they helped us quickly find the perfect home. Then recently, we decided to sell the home and we did not...



Robert & Sara

Sold a Single Family Home in Copperstone,
Mission Viejo, CA.



Daniel & Justine

Bought a Single Family home in Avendale Village,
Mission Viejo, CA.

This was my fiancé and I's first home purchase, so we were totally uninformed about the entire process, and Jeff and Julie walked us through every step of the way. Everything I've heard about purchasing a...

Local Experts. We are here 24/7 to assist you with your Orange County home buying and selling needs from start to finish.

Jeff And Julie Mora

Message

Please let us know how we can help you.

This site uses cookies to enhance your browsing experience and deliver our information and services. By using this site, you agree to our use of cookies.

HOME LISTINGS SELLING ABOUT OUR CURRENT LISTINGS REGISTER SIGN IN

HOME

LISTINGS ▾

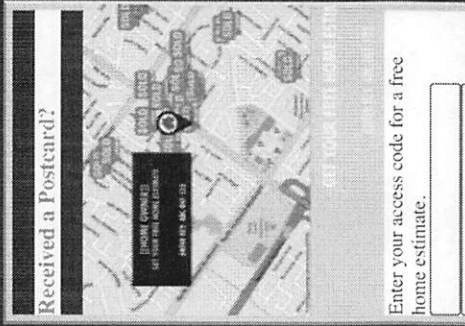
SELLING ▾

ABOUT ▾

OUR CURRENT LISTINGS

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Jeff And Julie Mora

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EXHIBIT B-TO DECLARATION OF JEFF MORAN

What the photos should look like:









